



Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.state.in.us/idem

## **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Batesville Manufacturing, Inc.  
1000 East Pearl Street  
Batesville, Indiana 47006**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T137-7280-00016	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 3, 2002  Expiration Date: December 3, 2007

## TABLE OF CONTENTS

### A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]
- A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

### B GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]
- B.3 Enforceability [326 IAC 2-7-7]
- B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
- B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]
- B.12 Emergency Provisions [326 IAC 2-7-16]
- B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
- B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-7-4]
- B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.19 Permit Revision Under Economic Incentives and Other Programs
- B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
- B.21 Source Modification Requirement [326 IAC 2-7-10.5]
- B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]
- B.23 Transfer of Ownership or Operation [326 IAC 2-7-11]
- B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

### C SOURCE OPERATION CONDITIONS

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

#### Testing Requirements [326 IAC 2-7-6(1)]

- C.9 Performance Testing [326 IAC 3-6]

#### Compliance Requirements [326 IAC 2-1.1-11]

- C.10 Compliance Requirements [326 IAC 2-1.1-11]

#### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Monitoring Methods [326 IAC 3]

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - Fourteen (14) Spray Booths Constructed Prior to July, 1997**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.5 Volatile Organic Compounds (VOC)
- D.1.6 VOC Emissions

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.1.7 Operator-Training Program

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.1.8 Record Keeping Requirements
- D.1.9 Reporting Requirements

**D.2 FACILITY OPERATION CONDITIONS - Two (2) Spray Booths Constructed After July, 1997**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.2.1 PSD Minor Modification Limit [326 IAC 2-2] [40 CFR 52.21]
- D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.2.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]
- D.2.4 Volatile Organic Compounds (VOC)[326 IAC 8-2-12]
- D.2.5 Particulate Matter (PM) [326 IAC 6-3-2(d)]
- D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.2.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)
- D.2.8 VOC and HAP Emissions

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.2.9 Operator-Training Program

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.2.10 Record Keeping Requirements
- D.2.11 Reporting Requirements

### **D.3 FACILITY OPERATION CONDITIONS**

#### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

**Certification**

**Emergency Occurrence Report**

**Quarterly and Monthly Reports**

**Quarterly Deviation and Compliance Monitoring Report**

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

---

The Permittee owns and operates a stationary burial casket manufacturing operation.

Responsible Official: Denny W. Knigga (Assembly, Stamping and Options Plants)

Source Address: (1) Assembly Plant  
1000 East Pearl Street, Batesville, Indiana 47006  
(2) Options Plant  
705 East Pearl Street, Batesville, Indiana 47006  
(3) Stamping Plant  
100 Eastern Avenue, Batesville, Indiana 47006

Mailing Address: 1000 East Pearl Street, Batesville, Indiana 47006

SIC Code: 3995

County Location: Ripley

County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program  
Major Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

---

This metal caskets manufacturing source consists of three (3) plants:

- (1) Plant #1 (Assembly Plant) is located at 1000 East Pearl Street, Batesville, Indiana 47006.
- (2) Plant #2 (Options Plant) is located at 705 East Pearl Street, Batesville, Indiana 47006.
- (3) Plant #3 (Stamping Plant) is located at 100 Eastern Avenue, Batesville, Indiana 47006.

IDEM has determined that Plants #2 and #3 are located adjacent to each other and Plant #1 is located nearby (within 0.5 miles distance). The three (3) plants are owned and operated by one (1) company, have the same SIC codes, and more than 50% of the products in Plant #2 are shipped to Plant #1. Therefore, the term "source" in the Part 70 documents refers the three (3) plants as one (1) source.

### A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

This stationary source consists of the following emission units and pollution control devices:

The source, which includes three (3) plants, consists of the following permitted emission units and pollution control devices:

Plant #1 (Assembly Plant, commenced operation in late 1950's):

- (a) One (1) electrostatic metal casket spray booth, identified as B-14-40, constructed in 1981, capable of processing 50 caskets per hour, using waterwash for overspray control, and exhausting through one (1) stack identified as 14-EF-40;

- (b) One (1) air atomization/electrostatic metal casket spray booth, identified as B-21-5455, constructed in the 1960s, capable of processing 90 caskets per hour, using waterwash for overspray control, and exhausting through two (2) stacks identified as 21-EF-54 and 21-EF-55;
- (c) One (1) electrostatic metal casket spray booth, identified as B-21-57, constructed in 1993, capable of processing 90 caskets per hour, using waterwash for overspray control, and exhausting through one (1) stack identified as 21-EF-57;
- (d) One (1) high volume low pressure (HVLP)/air atomization/electrostatic metal casket spray booth, identified as B-21-5652, constructed in 1992, capable of processing 90 caskets per hour, using waterwash for overspray control, and exhausting through three (3) stacks identified as 21-EF-5, 21-EF-6 and 21-EF-52;
- (e) One (1) air atomization/electrostatic metal casket spray booth, identified as B-21-2324, constructed in the 1960s, capable of processing 90 caskets per hour, using waterwash for overspray control, and exhausting through two (2) stacks identified as 21-EF-23 and 21-EF-24;
- (f) Three (3) air atomization spray booths, identified as B-60-33, B-60-35 and B-60-39, respectively, constructed in the 1960s, each using dry filters for overspray control, and each exhausting through one (1) stack identified as 60-EF-33, 60-EF-35, and 60-EF-39, respectively;
- (g) Two (2) air atomization/electrostatic disk spray booths, identified as B-60-20 and B-60-21, respectively, constructed in 1972, each using dry filters for overspray control, and each exhausting through one (1) stack identified as 60-EF-20 and 60-EF-21, respectively;
- (h) Two (2) air atomization/electrostatic spray booths, identified as B-61P-5 and B-61P-11, respectively, constructed in early 1972, each using waterwash for overspray control, and each exhausting through one (1) stack identified as 61P-EF-5 and 61P-EF-11, respectively;
- (i) One (1) brush sander, equipped with a jet pulse baghouse, exhausting through one (1) stack inside the building, identified as S2;

Plant #2 (Options Plant):

- (j) One (1) metal urn surface coating line capable of coating 36 urns per hour, constructed in 1999, consisting of two (2) spray booths, identified as P-M-1 and P-M-2, each utilizing high volume low pressure (HVLP) spray equipment and dry filters for particulate matter control, and exhausting through one (1) stack ID S-M-1;
- (k) One (1) wood urn surface coating line capable of coating 32 urns per hour, constructed in 1999, consisting of two (2) spray booths, identified as P-W-1 and P-W-2, each utilizing high volume low pressure (HVLP) spray equipment and dry filters for particulate matter control, and exhausting through one (1) stack ID S-W-1; and

Plant #3 (Stamping Plant, commenced operation in the early 1950s):

- (l) Miscellaneous clean-up solvents usage throughout the plant.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

---

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.[326 IAC 6-3-2(c)] (covered under C.1)
- (b) Other activities or categories identified with a process weight rate of less than 100 pounds per hour and a potential to emit less than significant levels:
  - (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;[326 IAC 6-3-2(c)] (covered under C.1)
  - (2) welding operations in Department C-14;[326 IAC 6-3-2(c)] (covered under C.1)
  - (3) zinc melting operations in Department C-56;[326 IAC 6-3-2(c)] (covered under C.1)
  - (4) zinc casting operations in Department C-56;[326 IAC 6-3-2(c)] (covered under C.1)
  - (5) vacuum metalizing operations in Departments C-60 & C61;[326 IAC 6-3-2(c)] (covered under C.1)
  - (6) welding operations in Stamping Plant;[326 IAC 6-3-2(c)] (covered under C.1)
  - (7) welding operations in Options Plant;[326 IAC 6-3-2(c)] (covered under C.1)
  - (8) plastic grinding operation;[326 IAC 6-3-2(c)] (covered under C.1) and
  - (9) woodworking operations in Options Plant controlled by baghouse BW-1 and exhausting inside the building.[326 IAC 6-3-2(c)] (covered under C.1)

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

---

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

---

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
  - (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
    - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
    - (2) The permitted facility was at the time being properly operated;
    - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
    - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967
    - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- within two (2) working days of the time when emission limitations were exceeded due to the emergency.
- The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

---

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

---

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

---

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal** [326 IAC 2-7-4]

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

---

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

---

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 **Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 **Opacity [326 IAC 5-1]**  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2] [326 IAC 9-1-2]**  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **Operation of Equipment [326 IAC 2-7-6(6)]**  
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 **Stack Height [326 IAC 1-7]**  
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34). The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

- (a) All testing performed to determine compliance with applicable emission limits contained in Title 326 IAC (Indiana Air Control Board), or for any other purpose requiring review and approval by IDEM shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

---

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

---

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 20, 1998.
- (b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

**C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

---

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]  
[326 IAC 2-7-6]

---

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

---

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6]

---

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## **Stratospheric Ozone Protection**

### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

Plant #1 (Assembly Plant, commenced operation in late 1950's):

- (a) One (1) electrostatic metal casket spray booth, identified as B-14-40, constructed in 1981, capable of processing 50 caskets per hour, using waterwash for overspray control, and exhausting through one (1) stack identified as 14-EF-40.
- (b) One (1) air atomization/electrostatic metal casket spray booth, identified as B-21-5455, constructed in the 1960s, capable of processing 90 caskets per hour, using waterwash for overspray control, and exhausting through two (2) stacks identified as 21-EF-54 and 21-EF-55;
- (c) One (1) electrostatic metal casket spray booth, identified as B-21-57, constructed in 1993, capable of processing 90 caskets per hour, using waterwash for overspray control, and exhausting through one (1) stack identified as 21-EF-57;
- (d) One (1) high volume low pressure (HVLP)/air atomization/electrostatic metal casket spray booth, identified as B-21-5652, constructed in 1992, capable of processing 90 caskets per hour, using waterwash for overspray control, and exhausting through three (3) stacks identified as 21-EF-5, 21-EF-6 and 21-EF-52;
- (e) One (1) air atomization/electrostatic metal casket spray booth, identified as B-21-2324, constructed in the 1960s, capable of processing 90 caskets per hour, using waterwash for overspray control, and exhausting through two (2) stacks identified as 21-EF-23 and 21-EF-24;
- (f) Three (3) air atomization spray booths, identified as B-60-33, B-60-35 and B-60-39, respectively, constructed in the 1960s, each using dry filters for overspray control, and each exhausting through one (1) stack identified as 60-EF-33, 60-EF-35, and 60-EF-39, respectively;
- (g) Two (2) air atomization/electrostatic disk spray booths, identified as B-60-20 and B-60-21, respectively, constructed in 1972, each using dry filters for overspray control, and each exhausting through one (1) stack identified as 60-EF-20 and 60-EF-21, respectively;
- (h) Two (2) air atomization/electrostatic spray booths, identified as B-61P-5 and B-61P-11, respectively, constructed in early 1972, each using waterwash for overspray control, and each exhausting through one (1) stack identified as 61P-EF-5 and 61P-EF-11, respectively;

Plant #3 (Stamping Plant, commenced operation in the early 1950s):

- (i) Miscellaneous clean-up solvents usage throughout the plant.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), the usages of VOC in the surface coating booths shall be limited as follows:

- (a) Pursuant to Minor Source Modification 137-14731-00016, issued on October 9, 2001, the VOC usage in the metal casket spray booth B-14-40 shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

- (b) Pursuant to CP137-2866-00004, issued on May 26, 1993, the operation of topcoat spray booth B-21-57 (stack ID. 21-EF-57) in Plant #1 shall comply with the following requirements of 326 IAC 8-1-6:
- (1) Use the coating materials with VOC content, as applied to the caskets, not to exceed 4.7 pounds per gallon less water. When using the coatings that exceed 4.7 pounds of VOC per gallon less water, compliance with the limit shall be expressed as a daily volume weighted average.
  - (2) Use electrostatic rotary atomizer spray equipment.
- (c) Pursuant to CP137-2381-00004, issued on June 25, 1992, as required by 326 IAC 8-1-6, the booth B-21-5652 (stack IDs. 21-EF-5, 21-EF-6 and 21-EF-52) in Plant #1 shall use coating materials with VOC content, as applied to the caskets, not to exceed 4.60 pounds per gallon less water. When using the coatings that exceed 4.6 pounds of VOC per gallon less water, compliance with the limit shall be expressed as a daily volume weighted average.
- (d) Daily volume weighted average shall be determined by the following equation:

$$A = \frac{\sum [(D_c * W_o * G) / (1 - V_w * (D_c / D_w))]}{\sum G}$$

where: A is the daily volume-weighted average (pounds VOC per gallon less water)  
Wo is the VOC content of coating in weight % organic  
G is the gallons of material (gal/unit)  
Vw is the volume % of water in coating  
Dc is the density of coating (lb/gal)  
Dw is the density of water (lb/gal)

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to CP 137-2381-00004, issued on June 25, 1992, use of VOC solvents at the booth B-21-5652 (stack IDs. 21-EF-5, 21-EF-6 and 21-EF-52) in Plant #1 shall not exceed 96 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. This limit effectively restricts the net contemporaneous VOC emission increase from the booth to less than 40 tons per year. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 do not apply.
- (b) Pursuant to CP 137-2866-00004, issued on May 26, 1993, records of VOC usage at the topcoat spray booth B-21-57 (stack ID 21-EF-57) in Plant #1 shall be maintained. VOC input to spray booth B-21-57 shall be limited to 88.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(d)]

The surface coating operations shall each be controlled by a waterwash or dry filter, and the control device shall be operated in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for any control devices.

## Compliance Determination Requirements

### D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3), 326 IAC 8-1-4(a)(4) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### D.1.6 VOC Emissions

Compliance with Conditions D.1.1(a) and D.1.2 (a) and (b) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.1.7 Operator-Training Program

Batesville Manufacturing shall implement an operator-training program.

- (a) All operators that perform paint spray operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of the issuance of the permit. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper waterwash flow pattern and flow rate, filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) or those items necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used in booths B-21-57 and B-21-5652 for each day;

- (4) The cleanup solvent usage, by weight, each month for booths B-14-40, B-21-57 and B-21-565; and
  - (5) The total VOC usage, by weight, each month for booths B-14-40, B-21-57 and B-21-5652.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
  - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2(a) and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

Plant #2 (Options Plant):

- (a) One (1) metal urn surface coating line capable of coating 36 urns per hour, constructed in 1999, consisting of two (2) spray booths, identified as P-M-1 and P-M-2, each utilizing high volume low pressure (HVLP) spray equipment and dry filters for particulate matter control, and exhausting through one (1) stack ID S-M-1; and
- (b) One (1) wood urn surface coating line capable of coating 32 urns per hour, constructed in 1999, consisting of two (2) spray booths, identified as P-W-1 and P-W-2, each utilizing high volume low pressure (HVLP) spray equipment and dry filters for particulate matter control, and exhausting through one (1) stack ID S-W-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 PSD Minor Modification Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP137-10452-00016, issued on April 29, 1999, the surface coating facilities in Plant #2 (Options Plant, including metal and wood urn coating lines) shall use less than 40 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance demonstrated at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP137-10452-00016, issued on April 29, 1999, the metal urn surface coating line shall use less than 25 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance demonstrated at the end of each month. This usage limit is required to limit the potential to emit of VOC from metal coating to less than 25 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.

#### D.2.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Pursuant to CP137-10452-00016, issued on April 29, 1999, each of the metal and wood urn surface coating lines shall use less than 10 and 25 tons of any single HAP and total HAPs, respectively, per 12 consecutive month period, with compliance demonstrated at the end of each month. The usage limits are required to limit the potential to emit of single HAP and total HAPs from urn (both metal and wood) coating operation to less than 10 and 25 tons per 12 consecutive month period, respectively. Compliance with this limit makes 326 IAC 2-4.1-1 not applicable.

#### D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the wood urn surface coating line shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application

Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

**D.2.5 Particulate Matter (PM) [326 IAC 6-3-2(d)]**

---

The surface coating operations shall each be controlled by a dry filter, and the control device shall be operated in accordance with manufacturer's specifications.

**D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

---

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for any control devices.

**Compliance Determination Requirements**

**D.2.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)**

---

Compliance with the VOC and HAPs content and usage limitations contained in Conditions D.2.1, D.2.2 and D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.2.8 VOC and HAP Emissions**

---

Compliance with Conditions D.2.1, D.2.2 and D.2.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and HAP usages for the most recent twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.2.9 Operator-Training Program**

---

Batesville Manufacturing shall implement an operator-training program.

- (a) All operators that perform paint spray operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of the issuance of the permit. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.2.10 Record Keeping Requirements**

---

- (a) To document compliance with Conditions D.2.1, D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits established in Conditions D.2.1, D.2.2 and D.2.3.
- (1) The amount and VOC and HAPs contents of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) or those items necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usages, by weight, for each month; and
  - (4) The total VOC and HAPs usages, by weight, for each month.
- (b) To document compliance with Condition D.2.9, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.2.11 Reporting Requirements**

---

A quarterly summary of the information to document compliance with Conditions D.2.1, D.2.2 and D.2.3 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### SECTION D.3 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:**

Plant #1 (Assembly Plant):

- (i) One (1) brush sander, equipped with a jet pulse baghouse, exhausting through one (1) stack inside the building, identified as S2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

##### D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the brush sander facilities shall not exceed 7.90 pounds per hour when operating at a process weight rate of 2.66 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Batesville Manufacturing, Inc.  
Source Address: (1) Assembly Plant - 1000 East Pearl Street, Batesville, Indiana 47006  
(2) Options Plant - 705 East Pearl Street, Batesville, Indiana 47006  
(3) Stamping Plant - 100 Eastern Avenue, Batesville, Indiana 47006  
Mailing Address: 1000 East Pearl Street, Batesville, IN 47006  
Part 70 Permit No.: T137-7280-00016

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Batesville Manufacturing, Inc.  
Source Address: (1) Assembly Plant - 1000 East Pearl Street, Batesville, Indiana 47006  
(2) Options Plant - 705 East Pearl Street, Batesville, Indiana 47006  
(3) Stamping Plant - 100 Eastern Avenue, Batesville, Indiana 47006  
Mailing Address: 1000 East Pearl Street, Batesville, IN 47006  
Part 70 Permit No.: T137-7280-00016

**This form consists of 2 pages**

**Page 1 of 2**

<p><b>9</b> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>c The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>c The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul>
---

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:



If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Batesville Manufacturing, Inc.  
Source Address: (1) Assembly Plant - 1000 East Pearl Street, Batesville, Indiana 47006  
(2) Options Plant - 705 East Pearl Street, Batesville, Indiana 47006  
(3) Stamping Plant - 100 Eastern Avenue, Batesville, Indiana 47006  
Mailing Address: 1000 East Pearl Street, Batesville, IN 47006  
Part 70 Permit No.: T137-7280-00016  
Facility: Spray Booth B-14-40  
Parameter: VOC  
Limit: Less than 25 tons per twelve (12) consecutive months

YEAR: \_\_\_\_\_

Month	Total VOC Emissions This Month (tons)	Previous 11 Month VOC Emissions (tons)	12 Month Total VOC Emissions (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### Part 70 Monthly Report

Source Name: Batesville Manufacturing, Inc.  
 Source Address: (1) Assembly Plant - 1000 East Pearl Street, Batesville, Indiana 47006  
 (2) Options Plant - 705 East Pearl Street, Batesville, Indiana 47006  
 (3) Stamping Plant - 100 Eastern Avenue, Batesville, Indiana 47006  
 Mailing Address: 1000 East Pearl Street, Batesville, IN 47006  
 Part 70 Permit No.: T137-7280-00016  
 Facility: Spray Booth 21-EF-57  
 Parameter: Coating Material VOC Content  
 Limit: Not to exceed 4.7 pounds of VOC per gallon less water

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day				Day			
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Batesville Manufacturing, Inc.  
Source Address: (1) Assembly Plant - 1000 East Pearl Street, Batesville, Indiana 47006  
(2) Options Plant - 705 East Pearl Street, Batesville, Indiana 47006  
(3) Stamping Plant - 100 Eastern Avenue, Batesville, Indiana 47006  
Mailing Address: 1000 East Pearl Street, Batesville, IN 47006  
Part 70 Permit No.: T137-7280-00016  
Facility: The topcoat spray booth B-21-57 in Plant #1 (Assembly Plant)  
Parameter: VOC  
Limit: VOC usage less than 88.3 tons per twelve (12) consecutive months

YEAR: \_\_\_\_\_

Month	Total VOC Usage This Month (tons)	Previous 11 Month VOC Usage (tons)	12 Month Total VOC Usage (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### Part 70 Monthly Report

Source Name: Batesville Manufacturing, Inc.  
 Source Address: (1) Assembly Plant - 1000 East Pearl Street, Batesville, Indiana 47006  
 (2) Options Plant - 705 East Pearl Street, Batesville, Indiana 47006  
 (3) Stamping Plant - 100 Eastern Avenue, Batesville, Indiana 47006  
 Mailing Address: 1000 East Pearl Street, Batesville, IN 47006  
 Part 70 Permit No.: T137-7280-00016  
 Facility: Spray Booth B-21-5652  
 Parameter: Coating Material VOC Content  
 Limit: Not to exceed 4.6 pounds of VOC per gallon less water

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day				Day			
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## Part 70 Monthly Report

Source Name: Batesville Manufacturing, Inc.  
Source Address: (1) Assembly Plant - 1000 East Pearl Street, Batesville, Indiana 47006  
(2) Options Plant - 705 East Pearl Street, Batesville, Indiana 47006  
(3) Stamping Plant - 100 Eastern Avenue, Batesville, Indiana 47006  
Mailing Address: 1000 East Pearl Street, Batesville, IN 47006  
Part 70 Permit No.: T137-7280-00016  
Facility: The booth B-21-5652 in Plant #1  
Parameter: VOC  
Limit: Use of VOC solvents limited to 96 tons per twelve (12) consecutive months

YEAR: \_\_\_\_\_

Month	Total VOC Emissions This Month (tons)	Previous 11 Month VOC Emissions (tons)	12 Month Total VOC Emissions (tons)
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

### Part 70 Quarterly Report

Source Name: Batesville Manufacturing, Inc.  
Source Address: (1) Assembly Plant - 1000 East Pearl Street, Batesville, Indiana 47006  
(2) Options Plant - 705 East Pearl Street, Batesville, Indiana 47006  
(3) Stamping Plant - 100 Eastern Avenue, Batesville, Indiana 47006  
Mailing Address: 1000 East Pearl Street, Batesville, IN 47006  
Part 70 Permit No.: T137-7280-00016  
Facility: The two (2) urn coating lines in Plant #2 (Options Plant)  
Parameter: VOC  
Limit: Less than 40 tons per twelve (12) consecutive months

YEAR: \_\_\_\_\_

Month	Total VOC Emissions This Month (tons)	Previous 11 Month VOC Emissions (tons)	12 Month Total VOC Emissions (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Batesville Manufacturing, Inc.  
Source Address: (1) Assembly Plant - 1000 East Pearl Street, Batesville, Indiana 47006  
(2) Options Plant - 705 East Pearl Street, Batesville, Indiana 47006  
(3) Stamping Plant - 100 Eastern Avenue, Batesville, Indiana 47006  
Mailing Address: 1000 East Pearl Street, Batesville, IN 47006  
Part 70 Permit No.: T137-7280-00016  
Facility: The metal urn surface coating line in Plant #2 (Options Plant)  
Parameter: VOC  
Limit: Less than 25 tons per twelve (12) consecutive months

YEAR: \_\_\_\_\_

Month	Total VOC Emissions This Month (tons)	Previous 11 Month VOC Emissions (tons)	12 Month Total VOC Emissions (tons)
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

### Part 70 Quarterly Report

Source Name: Batesville Manufacturing, Inc.  
 Source Address: (1) Assembly Plant - 1000 East Pearl Street, Batesville, Indiana 47006  
 (2) Options Plant - 705 East Pearl Street, Batesville, Indiana 47006  
 (3) Stamping Plant - 100 Eastern Avenue, Batesville, Indiana 47006 Batesville  
 Manufacturing, Inc.  
 Mailing Address: 1000 East Pearl Street, Batesville, IN 47006  
 Part 70 Permit No.: T137-7280-00016  
 Facility: Each of the metal and wood urn coating lines in Plant #2 (Options Plant)  
 Parameter: Single HAP and Total HAPs  
 Limit: Worst-case single HAP and total HAPs Less than 10 and 25 tons per twelve (12)  
 consecutive months, respectively

YEAR: \_\_\_\_\_

Month	Urn Coating Line	HAPs Emissions This Month (tons)		Previous 11 Month HAPs Emissions (tons)		12 Month Total HAPs Emissions (tons)	
		Single	Total	Single	Total	Single	Total
Month 1	Metal						
	Wood						
Month 2	Metal						
	Wood						
Month 3	Metal						
	Wood						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Batesville Manufacturing, Inc.  
 Source Address: (1) 1000 East Pearl Street, Batesville, IN 47006  
 (2) 100 Eastern Street, Batesville, IN 47006  
 (3) 705 East Pearl Street, Batesville, IN 47006  
 Mailing Address: 1000 East Pearl Street, Batesville, IN 47006  
 Part 70 Permit No.: T137-7280-00016

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

<p>This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



- (a) The Options Plant and the Stamping Plant are located on contiguous properties and the Assembly Plant is located within 0.5 miles of the Stamping Plant.
- (b) The three (3) plants are owned and operated by one (1) company, have the same SIC code, and close to 50% of the products from the Stamping Plant are shipped to the Assembly Plant.

This determination is consistent with determinations for other sources with similar situations. This determination is also applicable to any other air programs covered under the Part 70 permit, which include, and are not limited to, the NESHAP programs set out in 40 CFR Part 61 and 40 CFR Part 63.

**Comment #2:**

Condition B.11 (Preventive Maintenance Plan) should be modified to remove the suggestion that "lack of proper maintenance" may form the basis for requiring modifications to a preventive maintenance plan. The requirement to revise a PMP for "lack of proper maintenance" does not make sense because the failure does not relate to the effectiveness of the PMP but only relates to the effectiveness of implementing the PMP. Revising one's PMP has no effect in such circumstances. Instead, the implementation would have to be improved. Batesville Manufacturing requests that the words "lack of proper maintenance" in Condition B.11(c) be replaced with "an insufficient PMP".

**Response #2:**

Condition B.11(c) indicates that the PMP shall contain proper maintenance procedures. Lack of proper maintenance can result from the failure to implement the PMP, implementing an inadequate PMP, or both. The comment identifies the first type of problem. OAQ would require an improved PMP to address the second. No change was made to Condition B.11 due to this comment.

**Comment #3:**

Condition C.9 (Performance Testing) should be modified to indicate that the specific testing requirements set out in that condition only apply to tests required by IDEM. The testing requirements set out in Condition C.9 should only apply to required compliance tests. Accordingly, Batesville Manufacturing requests that Condition C.9 (a) be modified to indicate the relevant portions of the specific regulation, as follows:

- (a) All testing **performed to determine compliance with applicable emission limits contained in the Indiana air rules, or for any other purpose requiring review and approval by IDEM** shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

**Response #3:**

OAQ has decided to revise Condition C.9 (a), in accordance with the language in 326 IAC 3-6-1, as follows:

- (a) All testing **performed to determine compliance with applicable emission limits contained in Title 326 IAC (Indiana Air Control Board), or for any other purpose requiring review and approval by IDEM** shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

**Comment #4:**

Batesville Manufacturing requests that Condition C.15 (Compliance Response Plan - Preparation, Implementation, Records, and Reports) be deleted, because the requirements exceed IDEM's authority. Specifically, there is no requirement under 326 IAC 2-7-5 or 326 IAC 2-7-6 for a source to prepare, develop or implement a "Compliance Response Plan". Therefore, this requirement is beyond the scope of the regulation.

If IDEM continues to impose this requirement even when it is not required by any applicable regulation, it should at least delete subsection (f). This subsection requires that monitoring required in Section D be performed when the emission unit is operating. However, the monitoring required in this permit relates primarily to operator training and should not have to be performed when the emission units are operating.

**Response #4:**

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement.

The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Condition C.15 (f) requires all monitoring as required in Section D be performed when the emission unit is operating. The condition is applicable to all facilities that require compliance monitoring including those facilities to be added to the source in the future that require compliance monitoring, except as otherwise provided by a rule or provided specifically in Section D. Due to the possibility of the existence of those future facilities, the condition shall remain, even if it is not appropriate for all facilities currently listed in Section D. Therefore, Condition C.15 was not revised due to the comment.

#### **Comment #5:**

Condition D.1.2 (b) attempts to impose an emission limit of 40 tons per year on the topcoat spray booth 21-EF-57. This requirement is improper and incorrect.

The cited permit, CP 137-2866-00004, involved a modification to the topcoat spray booth which included the replacement of the back section, the stack, and the conversion of the spraying equipment to electrostatic rotary atomizers. It did not involve installing a new emission unit that accepted a synthetic minor limit to avoid PSD. On the contrary, the changes identified in this permit were merely a modification to an existing booth.

The original permit, CP 137-2866-00004, did not impose a 40 tons per year limit on the topcoat spray booth as a result of this change. Instead, it included the following requirement:

"Any Change or modification which may result in a net increase in potential emissions of 40 tons per year from the equipment covered in this permit shall obtain a PSD permit pursuant to 326 IAC 2-2 before any such change may occur."

No record keeping was required in Permit CP 137-2866-00004 to ensure that any net emissions increase did not exceed 40 tons per year.

The attempted imposition of a requirement to limit the topcoat spray booth to 40 tons per year based on this permit is incorrect because the spray booth had potential emissions of greater than 40 tons per year before the 1993 modification. This permit cannot now ratchet back the emissions to levels that were below the potential to emit prior to the 1993 changes. In addition, this permit should not require record keeping for any specific emission limit because no specific emission limit exists and none was included in the original permit No. CP 137-2866-00004.

Further, Title V was not intended to add new requirements; nor was it intended to "look back" at prior determinations. Accordingly, Condition D.1.2 (b) must be deleted.

#### Response #5:

One of the purposes for issuing a Title V permit to a source is to correct the deficiencies or mistakes in the existing permits previously issued to the source. In processing the Title V permit for Batesville Manufacturing, IDEM identified that there was a deficiency in the operating conditions when CP 137-2866-00004 was issued. When the topcoat spray booth B-21-57 was modified, the unlimited potential to emit VOC from spray booth B-21-57 was increased to 120.3 tons per year. Prior to the modification, the topcoat spray booth had actual annual VOC emissions of 48.4 tons per year. The contemporaneous increase in VOC potential emissions due to the modification, calculated based on US EPA's guideline, were 71.9 tons per year which were more than the PSD significant threshold level (for an existing major PSD source) of 40 tons per year. Therefore, to render PSD review pursuant to 326 IAC 2-2 not applicable, total VOC usage at the topcoat spray booth B-21-57 shall be limited to 88.3 tons per twelve (12) consecutive month period to maintain the contemporaneous VOC emission increase after the modification to be less than 40 tons per year. Also, record keeping and reporting of VOC emissions are required to make the limit federally enforceable. Therefore, Condition D.1.2 (b) has been revised as follows:

- (b) Pursuant to CP 137-2866-00004, issued on May 26, 1993, records of VOC usage at the topcoat spray booth B-21-57 (stack ID 21-EF-57) in Plant #1 shall be maintained. ~~Any change or modification to the spray booth that would increase the PTE VOC input to from the spray booth B-21-57 40 tons per year or more must be approved by OAG before such change may occur~~ **shall be limited to 88.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

Also, Conditions D.1.6 (VOC Emissions) and D.1.10 (now re-numbered as D.1.9)(Reporting Requirements) were revised to indicate that record keeping and reporting to demonstrate compliance with the requirement of D.1.2 (b) is required, as follows:

#### D.1.6 VOC Emissions

---

Compliance with Conditions D.1.1(a) and D.1.2 (a) **and (b)** shall be demonstrated **within 30 days of** ~~at~~ the end of each month based on the total volatile organic compound usage for the most recent month.

#### D.1.109 Reporting Requirements

---

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2(a) **and (b)**, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

A reporting form for showing compliance with D.1.2(b) was added, as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Batesville Manufacturing, Inc.  
Source Address: (1) Assembly Plant - 1000 East Pearl Street, Batesville, Indiana 47006  
(2) Options Plant - 705 East Pearl Street, Batesville, Indiana 47006  
(3) Stamping Plant - 100 Eastern Avenue, Batesville, Indiana 47006  
Mailing Address: 1000 East Pearl Street, Batesville, IN 47006  
Part 70 Permit No.: T137-7280-00016  
Facility: The topcoat spray booth B-21-57 in Plant #1 (Assembly Plant)  
Parameter: VOC  
Limit: VOC usage less than 88.3 tons per twelve (12) consecutive months

YEAR: \_\_\_\_\_

Month	Total VOC Usage This Month (tons)	Previous 11 Month VOC Usage (tons)	12 Month Total VOC Usage (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Comment #6:**

A new condition should be added to include the 25 tons per year emission limit on stack ID 14-EF 40 in Plant 1. This will ensure the state BACT rule, 326 IAC 8-1-6, will not apply.

**Response #6:**

Condition D.1.1 (a) already requires that the VOC usage in the metal casket spray booth B-14-40, which is the only booth that exhausts through Stack 14-EF-40, be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, no change was made due to the comment.

**Comment #7:**

Conditions D.1.8 and D.2.10 (Operator-Training Program) - These two conditions should be modified to reflect that the existing operators should be trained within 90 days of the effective date of the permit to be consistent with the timeline set out in Condition C.11. The current requirement of requiring existing operators to be trained "within 60 days of the date of stay agreement" does not make sense in the context of this permit. Accordingly, Conditions D.1.8 (a) and D.2.10 (a) should be modified as follows:

- (a) All operators that perform paint spray operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within ~~60 days of the date of stay agreement~~ **90 days of the effective date of the permit**. All new operators shall be trained upon hiring or transfer.

**Response #7:**

The sentence "All existing operators shall be trained within 60 days of the date of stay agreement" was part of the language agreed upon between IDEM and Batesville Manufacturing and was included in Administrative Amendment No. 137-14448-00016, issued on July 18, 2001. However, to make it better suited for this permit, both Conditions D..8 (a) and D.2.10 (a) have been revised as follows:

- (a) All operators that perform paint spray operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of ~~stay agreement~~ **the issuance of the permit**. All new operators shall be trained upon hiring or transfer.

**Comment #8:**

As discussed in Comment #4, a new section (d) should be added for both Conditions D.1.8 and D.2.10 indicating that the Compliance Monitoring Condition is not required to be implemented when the emission unit it operating, as follows:

- (d) **This Compliance Monitoring Condition is not required to be performed when the emission unit is operating.**

**Response #8:**

It is OAQ's opinion that, even for operator training, it will be more effective to conduct the majority of the training at an operating facility. A short classroom-type introduction to operators does not constitute a violation to Condition C.15 (f). Therefore, no change was made due to the comment.

**Comment #9:**

Condition D.1.9 (Record Keeping Requirements) should be modified to remove usage limits for B-21-57 since no VOC usage emission limitations should apply to B-21-57. In addition, Conditions (a)(4) - (a)(6) should be revised to avoid redundancy, as follows:

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) or those items necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used in booths B-21-57 and B-21-5652 for each day;
  - (4) The cleanup solvent usage, **by weight**, each month for booths B-14-40, ~~B-21-57~~ and B-21-565; **and**
  - (5) The total VOC usage, **by weight**, each month for booths B-14-40, B-21-57 and B-21-5652; ~~and~~.
  - ~~(6) The weight of VOCs emitted for each compliance period.~~

**Response #9:**

As discussed in Response #5, record keeping and reporting of VOC usage for B-21-57 are required. However, to clarify that records of VOC should be documented by weight and also to avoid redundancy, Conditions (a)(4) and (a)(5) have been revised and Condition (a)(6) has been removed, as follows:

- (4) The cleanup solvent usage, **by weight**, each month for booths B-14-40, ~~B-21-57~~ and B-21-565; **and**
- (5) The total VOC usage, **by weight**, each month for booths B-14-40, B-21-57 and B-21-5652; ~~and~~.
- ~~(6) The weight of VOCs emitted for each compliance period.~~

**Comment #10:**

Condition D.2.11 (Record Keeping Requirements) - Conditions (a)(3) - (a)(5) should be revised to avoid redundancy, as follows:

- (a) To document compliance with Conditions D.2.1, D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits established in Conditions D.2.1, D.2.2 and D.2.3.
- (1) The amount and VOC and HAPs contents of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) or those items necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usages for each month; **and**
  - (4) The total VOC and HAPs usages for each month; ~~and~~
  - ~~(5) The amounts of VOCs and HAPs emitted for each compliance period.~~

**Response #10:**

Conditions (a)(3) and (a)(4) have been revised to clarify that records of VOC and HAPs should be documented by weight and Condition (a)(5) has been removed to avoid redundancy, as follows:

- (3) The cleanup solvent usages, **by weight**, for each month; **and**
- (4) The total VOC and HAPs usages, **by weight**, for each month; ~~and~~
- ~~(5) The amounts of VOCs and HAPs emitted for each compliance period.~~

**Comment #11:**

Section D.3 - Brush Sander - This section should be deleted because there are no emissions to the atmosphere because the emissions are vented indoors. Since emissions vented indoors are not considered part of "ambient air," they are not regulated by this rule and therefore this condition should be deleted.

**Response #11:**

Even though the emissions from the Brush Sander are vented indoors, the emissions are not vented to a 100% enclosed building. The emissions will leak through openings, such as doors, windows, roof vents,... etc. and will eventually vent to the "ambient air." Therefore, Section D.3 will not be removed from the permit.

**Comment #12:**

Batesville Manufacturing requests that all changes referenced in this comment letter be included in the Technical Support Document.

## Response #12:

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

## OAQ's REVISIONS

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. In order to be consistent with language in 326 IAC 2-7-12(b)(2), the "(D)(i)" of rule listed in (b) of Condition B.19 (Permit Revisions Under Economic Incentives and Other Programs) has been removed, as follows:  
  
B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

---

  - (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
  - (b) Notwithstanding 326 IAC 2-7-12(b)(1)~~(D)(i)~~ and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.
2. To clarify the proper timing of determining compliance with VOC and HAP usage limits, the words "twelve (12) consecutive month period" in Conditions D.1.1 (a), D.1.2 (a), D.2.1, D.2.2 and D.2.3 have been replaced with "twelve (12) consecutive month period, **with compliance demonstrated at the end of each month**".
3. Condition D.1.6 has been revised, to give the Permittee a reasonable time for demonstrating compliance, as follows:  
  
D.1.6 VOC Emissions

---

Compliance with Conditions D.1.1(a) and D.1.2 (a) and (b) shall be demonstrated **within 30 days of** ~~at~~ the end of each month based on the total volatile organic compound usage for the most recent month.
4. Conditions D.1.3 and D.2.5 have been revised, to reflect the recent changes to 326 IAC 6-3-2, as follows:  
  
D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(d)]

---

~~The PM from the paint spray booths shall not exceed the pound per hour emission rate established as E in the following formula:—~~

~~Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

~~$$E = 4.10 P^{0.67}$$
 where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour~~

~~**The surface coating operations shall each be controlled by a waterwash or dry filter, and the control device shall be operated in accordance with manufacturer's specifications.**~~

D.2.5 Particulate Matter (PM) [326 IAC 6-3-2(d)]

~~Pursuant to 326 IAC 6-3-2, the PM from the two (2) urn coating lines shall not exceed the pound per hour emission rate established as E in the following formula:—~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

~~$$E = 4.10 P^{0.67}$$
 where E = rate of emission in pounds per hour;  
and P = process weight rate in tons per hour~~

~~**The surface coating operations shall each be controlled by a dry filter, and the control device shall be operated in accordance with manufacturer's specifications.**~~

5. Since the use of the control device is a requirement of 326 IAC 6-3-2(d), as stated in Conditions D.1.3 and D.2.5, Conditions D.1.7 and D.2.9 have been removed from the permit.

6. An error in Condition D.2.8 was corrected as follows:

D.2.8 VOC and HAP Emissions

Compliance with Conditions D.2.1, D.2.2 and D.2.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound **and HAP** usages for the most recent twelve (12) month period.

7. Condition D.2.12 (now re-numbered as D.2.11)(Reporting Requirements) was revised to indicate that the report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34), as follows:

D.2.121 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1, D.2.2 and D.2.3 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



- (b) One (1) air atomization/electrostatic metal casket spray booth, identified as B-21-5455, constructed in the 1960s, capable of processing 90 caskets per hour, using waterwash for overspray control, and exhausting through two (2) stacks identified as 21-EF-54 and 21-EF-55;
- (c) One (1) electrostatic metal casket spray booth, identified as B-21-57, constructed in 1993, capable of processing 90 caskets per hour, using waterwash for overspray control, and exhausting through one (1) stack identified as 21-EF-57;
- (d) One (1) high volume low pressure (HVLP)/air atomization/electrostatic metal casket spray booth, identified as B-21-5652, constructed in 1992, capable of processing 90 caskets per hour, using waterwash for overspray control, and exhausting through three (3) stacks identified as 21-EF-5, 21-EF-6 and 21-EF-52;
- (e) One (1) air atomization/electrostatic metal casket spray booth, identified as B-21-2324, constructed in the 1960s, capable of processing 90 caskets per hour, using waterwash for overspray control, and exhausting through two (2) stacks identified as 21-EF-23 and 21-EF-24;
- (f) Three (3) air atomization spray booths, identified as B-60-33, B-60-35 and B-60-39, respectively, constructed in the 1960s, each using dry filters for overspray control, and each exhausting through one (1) stack identified as 60-EF-33, 60-EF-35, and 60-EF-39, respectively;
- (g) Two (2) air atomization/electrostatic disk spray booths, identified as B-60-20 and B-60-21, respectively, constructed in 1972, each using dry filters for overspray control, and each exhausting through one (1) stack identified as 60-EF-20 and 60-EF-21, respectively;
- (h) Two (2) air atomization/electrostatic spray booths, identified as B-61P-5 and B-61P-11, respectively, constructed in early 1972, each using waterwash for overspray control, and each exhausting through one (1) stack identified as 61P-EF-5 and 61P-EF-11, respectively;
- (i) One (1) brush sander, equipped with a jet pulse baghouse, exhausting through one (1) stack inside the building, identified as S2;

**Plant #2 (Options Plant):**

- (j) One (1) metal urn surface coating line capable of coating 36 urns per hour, constructed in 1999, consisting of two (2) spray booths, identified as P-M-1 and P-M-2, each utilizing a high volume low pressure (HVLP) spray equipment and dry filters for particulate matter control, and exhausting through one (1) stack ID S-M-1;
- (k) One (1) wood urn surface coating line capable of coating 32 urns per hour, constructed in 1999, consisting of two (2) spray booths, identified as P-W-1 and P-W-2, each utilizing high volume low pressure (HVLP) spray equipment and dry filters for particulate matter control, and exhausting through one (1) stack ID S-W-1; and

**Plant #3 (Stamping Plant, commenced operation in the early 1950s):**

- (l) Miscellaneous clean-up solvents usage throughout the plant.

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million

British thermal units (mmBtu) per hour:

- (1) Department 21
  - (A) one (1) natural gas fired primer oven with a rated heat input of 3.5 mmBtu/hr;
  - (B) one (1) natural gas fired topcoat oven with a rated heat input of 3.2 mmBtu/hr;
  - (C) one (1) natural gas fired rerun prime oven with a rated heat input of 0.8 mmBtu/hr;
  - (D) one (1) natural gas fired rerun topcoat oven with a rated heat input of 0.8 mmBtu/hr;
  - (E) two (2) natural gas fired rerun air make-up units each with a rated heat input of 3.6 mmBtu/hr;
  - (F) one (1) natural gas fired prime air make-up unit with a rated heat input of 6.5 mmBtu/hr;
  - (G) one (1) natural gas fired topcoat air make-up unit with a rated heat input of 2.625 mmBtu/hr;
  - (H) two (2) natural gas fired air make-up units each with a rated heat input of 4.0 mmBtu/hr;
  - (I) one (1) natural gas fired unit heater with a rated heat input of 0.3 mmBtu/hr;
  - (J) one (1) natural gas fired floor furnace with a rated heat input of 1.25 mmBtu/hr;
  - (K) one (1) natural gas fired color air make-up unit with a rated heat input of 3.5 mmBtu/hr;
  - (L) one (1) natural gas fired shade and topcoat air make-up unit with a rated heat input of 5.5 mmBtu/hr;
  - (M) one (1) natural gas fired paint mix room heater with a rated heat input of 2.0 mmBtu/hr;
  
- (2) Department C-14
  - (A) four (4) natural gas fired washer heaters each with a rated heat input of 1.5 mmBtu/hr;
  - (B) one (1) natural gas fired washer heater with a rated heat input of 2.5 mmBtu/hr;
  - (C) one (1) natural gas fired washer dry-off heater with a rated heat input of 1.65 mmBtu/hr;
  - (D) one (1) natural gas fired air make-up unit with a rated heat input of 2.0 mmBtu/hr;
  - (E) one (1) natural gas fired air make-up unit with a rated heat input of 2.5 mmBtu/hr;
  - (F) one (1) natural gas fired air make-up unit with a rated heat input of 2.2 mmBtu/hr;
  - (G) one (1) natural gas fired sludge dryer with a rated heat input of 0.325 mmBtu/hr;
  - (H) ten (10) natural gas fired space heaters each with a rated heat input of 0.175 mmBtu/hr;
  - (I) four (4) natural gas fired HVAC units with a total rated heat input of 0.566 mmBtu/hr;
  - (J) two (2) natural gas fired unit heaters with a total rated heat input of 0.45 mmBtu/hr;
  - (K) one (1) natural gas fired air make-up unit with a rated heat input of 0.292 mmBtu/hr;
  
  - (L) two (2) natural gas fired door heaters each with a rated heat input of 1.0 mmBtu/hr;
  
- (3) Offices

- (A) twelve (12) natural gas fired heaters with a total rated heat input of 1.14 mmBtu/hr;
- (4) Departments C-9, C-10, C-13 and C-61P
- (A) one (1) natural gas fired shipping air make-up unit with a rated heat input of 3.0 mmBtu/hr;
  - (B) one (1) natural gas fired air make-up unit with a rated heat input of 1.32 mmBtu/hr;
  - (C) one (1) natural gas fired unit heater with a rated heat input of 0.4 mmBtu/hr;
  - (D) four (4) natural gas fired door heaters each with a rated heat input of 1.0 mmBtu/hr;
  - (F) two (2) natural gas fired furnaces each with a rated heat input of 0.625 mmBtu/hr;
  - (G) one (1) natural gas fired floor furnace with a rated heat input of 1.25 mmBtu/hr;
  - (H) three (3) natural gas fired HVAC units with a total rated heat input of 0.46 mmBtu/hr;
  - (I) two (2) natural gas fired ovens each with a rated heat input of 0.5 mmBtu/hr;
  - (J) one (1) natural gas fired air make-up unit with a total rated heat input of 2.2 mmBtu/hr;
  - (K) three (3) natural gas fired HVAC units with a total rated heat input of less than 1.5 mmBtu/hr;
- (5) Departments C-60 and C-56
- (A) one (1) natural gas fired washer heater with a rated heat input of 1.5 mmBtu/hr;
  - (B) one (1) natural gas fired dry-off heater with a rated heat input of 0.35 mmBtu/hr;
  - (C) one (1) natural gas fired caustic dip heater with a rated heat input of 1.5 mmBtu/hr;
  - (D) one (1) natural gas fired caustic rinse heater with a rated heat input of 3.8 mmBtu/hr;
  - (E) one (1) natural gas fired caustic dry-off heater with a rated heat input of 0.8 mmBtu/hr;
  - (F) one (1) natural gas fired base coat oven with a rated heat input of 1.5 mmBtu/hr;
  - (G) two (2) natural gas fired air make-up units each with a rated heat input of 3.15 mmBtu/hr;
  - (H) one (1) natural gas fired air make-up unit with a rated heat input of 2.0 mmBtu/hr;
  - (I) one (1) natural gas fired paint mix room air make-up unit with a rated heat input of 0.292 mmBtu/hr;
  - (J) one (1) natural gas fired unit heater with a rated heat input of 0.3 mmBtu/hr;
  - (K) five (5) natural gas fired holding furnaces each with a rated heat input of 0.25 mmBtu/hr;
  - (L) one (1) natural gas fired key machine furnace with a rated heat input of 0.25 mmBtu/hr;
  - (M) one (1) natural gas fired premelt furnace with a rated heat input of 1.675 mmBtu/hr;
  - (N) one (1) natural gas fired holding furnace with a rated heat input of 1.1 mmBtu/hr;
  - (O) one (1) natural gas fired reclaim furnace with a rated heat input of 1.0 mmBtu/hr;
- (6) Stamping Plant:

- (A) two (2) natural gas fired phosphate washer heaters each with a rated heat input of 2.5 mmBtu/hr;
  - (B) one (1) natural gas fired cap washer heater with a rated heat input of 2.5 mmBtu/hr;
  - (C) six (6) natural gas fired space heaters each with a rated heat input of 0.175 mmBtu/hr;
  - (D) two (2) natural gas fired door heaters each with a rated heat input of 1.0 mmBtu/hr;
  - (E) one (1) natural gas fired air make-up unit with a rated heat input of 4.0 mmBtu/hr;
  - (F) one (1) natural gas fired air make-up unit with a rated heat input of 4.75 mmBtu/hr;
  - (G) one (1) natural gas fired air make-up unit with a rated heat input of 0.75 mmBtu/hr;
- (7) Options Plant:
- (A) two (2) natural gas fired air make-up units each with a rated heat input of 0.896 mmBtu/hr;
  - (B) various soldering irons with a total rated heat input of 1.6 mmBtu/hr;
- (b) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than 6.0 mmBtu/hr;
  - (c) Combustion source flame safety purging on startup;
  - (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
  - (e) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
  - (f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
  - (g) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;
  - (h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
  - (i) Machining where an aqueous cutting coolant continuously floods the machining interface;
  - (j) Cleaners and solvents characterized as follows:
    - (1) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38°C (100°F) or;
    - (2) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured at 20°C (68°F);
  - (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
  - (l) Closed loop heating and cooling systems;
  - (m) Infrared cure equipment;
  - (n) Activities associated with the treatment of wastewater streams with an oil and grease content

- less than or equal to 1% by volume;
- (o) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
  - (p) Forced and induced draft cooling tower system not regulated under a NESHAP;
  - (q) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
  - (r) Heat exchanger cleaning and repair;
  - (s) Process vessel degassing and cleaning to prepare for internal repairs;
  - (t) Paved and unpaved roads and parking lots with public access;
  - (u) Enclosed systems for conveying plastic raw materials and plastic finished goods;
  - (v) Asbestos abatement projects regulated by 326 IAC 14-10;
  - (w) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any product process;
  - (x) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
  - (y) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
  - (z) Diesel generators not exceeding 1600 horsepower;
  - (aa) Stationary fire pumps;
  - (bb) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;
  - (cc) Filter or coalescer media changeout;
  - (dd) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38°C);
  - (ee) A laboratory as defined in 326 IAC 2-7-1 (21) (C);
  - (ff) The following operations emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
    - (1) welding operations in Department C-14;
    - (2) zinc melting operations in Department C-56;
    - (3) zinc casting operations in Department C-56;
    - (4) vacuum metalizing operations in Departments C-60 & C61;
    - (5) welding operations in Stamping Plant;
    - (6) welding operations in Optional Plant;
  - (gg) The following operations emitting greater than 1 pound per day but less than 12.5 pounds per

- day or 2.5 ton per year of any combinations of HAPs:
- (1) Aboveground storage tanks gasoline (300 gallons), wastewater blending (normally empty, 12,000 gallons), and miscellaneous chemicals (KOH with traces of phenol and glycol ether) (10,000 gallons);
  - (2) drums/totes containing miscellaneous chemicals including coatings and solvents, hydraulic oil/machine oils;
  - (3) two (2) bulk paint tanks (3,000 gallons each); and
- (hh) The following activities or categories not previously identified:
- (1) plastic grinding operation;
  - (2) foot lining mattress, fabric interior and installation in Department C-13;
  - (3) process-related vehicular traffic on paved roads;
  - (4) process-related vehicular traffic on unpaved roads;
  - (5) wastewater treatment and sludge dryer;
  - (6) woodworking operations woodworking operations in Options Plant controlled by baghouse BW-1 and exhausting inside the building.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 69-12-89-0090, issued on February 6, 1986.
- (b) OP 69-12-89-0091, issued on February 6, 1986.
- (c) OP 69-12-89-0092, issued on February 6, 1986.
- (d) OP 69-12-89-0093, issued on February 6, 1986.
- (e) CP 137-2381-00004, issued on June 25, 1992.
- (f) CP 137-2866-00004, issued on May 26, 1993.
- (g) A 137-5679-00004 (Amendment to CP 137-2866-00004), issued on June 11, 1996.
- (h) Exemption Letter 137-2530-00004, issued on May 11, 1992.
- (i) CP 137-7151-00015, issued on March 18, 1997.
- (k) Construction Permit No. 137-10452-00016, issued on April 29, 1999.
- (l) Minor Source Modification No. 137-12307-00016, issued on November 6, 2000.
- (m) No. 137-12938-00016, issued on December 11, 2000, for the revocation of Minor Source Modification No. 137-12307-00016.
- (n) Administrative Amendment No. 137-14448-00016, issued on July 18, 2001.
- (o) Minor Source Modification No. 137-14731-00016, issued on October 9, 2001.

All conditions from previous approvals were incorporated into this Part 70 permit, except for:

- (a) The Minor Source Modification No. 137-12307-00016, issued on November 6, 2000, which was revoked on December 11, 2000.
- (b) The three (3) HVLP guns in spray booths 001A and 001B of the Plant #2 (Options Plant)

permitted under CP 137-7151-00015, issued on March 18, 1997. The spray booths 001A and 001B have been removed.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on November 25, 1996. Additional information was received on March 10, 1998, April 30, 1998, May 1, 1998 and June 9, 1998.

There was no notice of completeness letter mailed to the source.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (five (5) pages).

**Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential Emissions (tons/year)
PM	1,750
PM-10	1,750
SO <sub>2</sub>	0.3
VOC	2,028
CO	45.7
NO <sub>x</sub>	56.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Xylene	444
Toluene	326
Ethylbenzene	72
Glycol ethers	221
TOTAL	1,026

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or

greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1996 OAQ mission data.

Pollutant	Actual Emissions (tons/year)
PM	2.3
PM-10	2.3
SO <sub>2</sub>	0.0
VOC	375.5
CO	0.0
NO <sub>x</sub>	0.0
MEK	2.2
Toluene	23.6
Xylene	69.7
Total HAPs	102.7

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/ facility	Limited Potential to Emit (tons/year)							
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP	Total HAPs
Assembly Plant	5.5	5.5	0.0	<1534.2	0.0	0.0	342.4	912.8
Options Plant	1.1	1.1	0.0	<40.0	0.0	0.0	<20.0	<50.0
Stamping Plant	0.0	0.0	0.0	<25.0	0.0	0.0	0.0	0.0
Brush Sander	10.8	10.8	0.0	0.0	0.0	0.0	0.0	0.0
Combustion	4.3	4.3	0.3	3.1	45.7	56.0	Neg.	Neg.
<b>Total Emissions</b>	<b>21.7</b>	<b>21.7</b>	<b>0.3</b>	<b>&lt;1,602.3</b>	<b>45.7</b>	<b>56.0</b>	<b>&lt;362.4</b>	<b>&lt;962.8</b>

**County Attainment Status**

The source is located in Ripley County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Ripley County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (a) All the storage tanks at the source have individual storage capacities of less than 10,500 gallons (40 cubic meter (m<sup>3</sup>)). Therefore, the requirements of New Source Performance Standards, Subpart Kb (326 IAC 12 and 40 CFR 60.110b - 60.117b), do not apply.
- (b) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (c) Surface coating of wood urns at the Plant #2 (Options Plant) is not subject to the requirements of National Emission Standards for Hazardous Air Pollutants, Subpart JJ (40 CFR 63.800 - 63.807), because coating wood urns is not a part of wood furniture manufacturing.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

This burial caskets manufacturer is a major stationary source because its potential to emit (PTE) VOC is greater than 250 tons per year. The emissions from this source were reviewed under the requirements of PSD. The source had a PTE VOC greater than 250 tons per year prior to the 326 IAC 2-2 applicability date of August 7, 1977 and all modifications to the source since August 7, 1977 had PTE increases less than significant PSD modification thresholds for all criteria pollutants. Therefore, the requirements of 326 IAC 2-2 do not apply. The modifications are described below:

- (a) OP 69-12-89-0093 issued on February 6, 1986, for one (1) brushed clearcoat spray booth B-14-40 (stack ID. 14-EF-40) located in Plant #1. The spray booth has a PTE VOC of less than 25 tons per year.

- (b) CP 137-2381-00004, issued on June 25, 1992, for one (1) primer booth B-21-5652 (stack IDs. 21-EF-5, 21-EF-6 and 21-EF-52) located in Plant #1. Pursuant to the operation conditions in CP 137-2381-00004, use of VOC solvents at the primer booth is limited to 16,000 pounds per calendar month. This limit effectively restricts the net contemporaneous VOC emission increase from the booth to less than 40 tons per year.
- (c) CP 137-2866-00004, issued on May 26, 1993, for one (1) topcoat spray booth B-21-57 (stack ID 21-EF-57) in Plant #1. Records of VOC usage at the booth is maintained to assure PTE VOC for the booth is less than 40 tons per year.
- (d) Exemption Letter 137-2530-00004, issued on May 11, 1992, for the addition of a wall to divide existing paint booth without increasing allowable emissions.
- (e) CP137-10452-00016, issued on April 29, 1999, the two (2) urn surface coating lines (one metal line and one wood line) shall use less than 40 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than 100 tons per year of PM-10 and VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

#### 326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

### **State Rule Applicability - Individual Facilities**

#### 326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which emits or has the PTE any single HAP or total HAPs of 10 and 25 tons per year or more, respectively, and is constructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Two (2) coating lines at the source, metal and wood urn surface coating in Options Plant, with an uncontrolled PTE of more than 10 and 25 tons per year of any single HAP and total HAPs, respectively, have been constructed after July 27, 1997. The single HAP and total HAPs emissions at these two (2) coating lines shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to this source.

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter emissions from the baghouse controlling the brush sander in the Assembly Plant shall be limited to 7.90 pounds per hour when operating at the maximum process weight rate of 2.66 tons/hr, (see Appendix A Page 1 of 5). The source will comply with the rule by operating the baghouse at all times when the brush sander is operating.

The allowable PM emissions from the brush sander are calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) The particulate matter (PM) overspray from the surface coating operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The waterwash and air filters shall be in operation at all times when the spray booths are in operation to comply with this limit.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not otherwise regulated by other provisions of article 8.

The compliance status for various facilities at the source are as follows:

- (a) The following booths in Plant #1 were all constructed prior to 1972:
- (1) the topcoat spray booth (stack IDs. 21-EF-54 and 21-EF-55);
  - (2) the clearcoat spray booth (stack IDs. 21-EF-23 and 21-EF-24);
  - (3) the three (3) hardware shade spray booths (stack IDs. 60-EF-33, 60-EF-35 and 60-EF-39);
  - (4) the two (2) hardware sealcoat and basecoat spray booths (stack IDs. 60-EF-20 and 60-EF-21); and
  - (5) the two(2) spray booths (stack IDs. 61P-EF-5 and 61P-EF-11).

Therefore, the requirements of 326 IAC 8-1-6 do not apply to these booths.

- (b) The miscellaneous clean-up solvents usage throughout the plant in Plant #3 (Stamping Plant) commenced operation in the 1950's, therefore, the requirements of 326 IAC 8-1-6 do not apply to the operation.
- (c) The brushed clearcoat spray booth (constructed in 1981, stack ID. 14-EF-40) in Plant #1 has a potential VOC emissions of 13.5 tons per year(see page 2 of 5 Appendix A). Therefore, the requirements of 326 IAC 8-1-6 do not apply to the facility.

- (d) Pursuant to CP137-2866-00004, issued on May 26, 1993, the topcoat spray booth (stack ID. 21-EF-57) in Plant #1 shall be in compliance with 326 IAC 8-1-6 by:
  - (1) Using the coating materials with VOC content, as applied to the caskets, not exceeding 4.7 pounds per gallon less water.
  - (2) Using electrostatic rotary atomizer spray equipment.
- (e) Pursuant to CP137-2381-00004, issued on June 25, 1992, the primer booth (stack IDs. 21-EF-5, 21-EF-6 and 21-EF-52) in Plant #1 shall be in compliance with 326 IAC 8-1-6 by using coating materials with VOC content, as applied to the caskets, not exceeding 4.60 pounds per gallon less water, expressed as a daily volume-weighted average.
- (f) Pursuant to CP137-10452-00016, issued on April 29, 1999, the metal urn surface coating line shall use less than 25 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable to the metal urn surface coating line.
- (g) Pursuant to Minor Source Modification 137-14731-00016, issued on October 9, 2001, the VOC usage in the metal casket spray booth B-14-40 shall be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (b), the surface coating operation at this burial caskets manufacturer is not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating).

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-12, the wood urn surface coating line shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

326 IAC 8-4 (Petroleum Sources)

Pursuant to 326 IAC 8-4-1, the gasoline dispensing operation at the source is not subject to the requirements of 326 IAC 8-4 (Petroleum Sources), because the source is not located in one of the county listed in 326 IAC 8-4-1(a). Therefore, the requirements of 326 IAC 8-4 do not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. The source is not subject to the requirements of 326 IAC 8-6, because all spray booths and solvent usage operations at the source commenced either prior to October 7, 1974 or after January 1, 1980.

No other Article 8 rules apply.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The source shall implement the following operator-training programs for the operations of all surface coating booths:

- (a) All operators that perform paint spray operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of stay agreement. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper waterwash flow pattern and flow rate, filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

These monitoring conditions are necessary because the waterwash and dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

## Conclusion

The operation of this burial caskets manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T137-7280-00016**.

**Appendix A: Emission Calculations  
Emission Summary**

**Company Name: Batesville Casket Company  
Address: 1000 East Pearl Street, Batesville, Indiana 47006  
CP: T137-7280  
Plt ID: 137-00016  
Reviewer: Scott Pan/EVP  
Date: April 8, 2002**

<b>Uncontrolled Potential Emissions (tons/year)</b>					
Pollutant	Emissions Generating Activity				
	Combustion		Surface Coating	Brush ** Sander	TOTAL
	Heating Units < 0.3 mmBtu/hr	Heating Units >= 0.3 mmBtu/hr			
PM	0.3	4.0	660.8	1,080.0	1,745.1
PM10	0.3	4.0	660.8	1,080.0	1,745.1
SO2	0.0	0.3	0.0	0.0	0.3
NOx	3.3	52.7	0.0	0.0	56.0
VOC	0.2	2.9	2,024.7	0.0	2,027.8
CO	1.4	44.3	0.0	0.0	45.7
total HAPs	0.0	0.0	1,026.3	0.0	1,026.3
worst single HAP	0.0	0.0	444.0	0.0	444.0

Total emissions based on rated capacity at 8,760 hours/year.

<b>Controlled Emissions (tons/year)</b>					
Pollutant	Emissions Generating Activity				
	Combustion		Surface Coating	Brush ** Sander	TOTAL
	Heating Units < 0.3 mmBtu/hr	Heating Units >= 0.3 mmBtu/hr			
PM	0.3	4.0	6.6	10.8	21.7
PM10	0.3	4.0	6.6	10.8	21.7
SO2	0.0	0.3	0.0	0.0	0.3
NOx	3.3	52.7	0.0	0.0	56.0
VOC	0.2	2.9	1,599.2	0.0	1,602.3
CO	1.4	44.3	0.0	0.0	45.7
total HAPs	0.0	0.0	962.8	0.0	962.8
worst single HAP	0.0	0.0	362.4	0.0	362.4

\*\* Controlled Brush Sander PM emissions =  $0.03 \text{ (grain/cu. ft.)} * 60 \text{ (min/hr)} * 9600 \text{ acfm} / 7000 \text{ (grain/lb)}$   
 $= 2.47 \text{ (lb/hr)} * 8760 \text{ (hr/yr)} / 2000 \text{ (lb/ton)}$   
 $= 10.8 \text{ ton/yr}$

\*\* Uncontrolled Brush Sander PM emissions =  $10.8 / (1 - 99\%) = 1080 \text{ tons/yr}$

**Compliance with 326 IAC 6-3-2:**

Allowable PM emissions for processing the maximum process weight rate of 2 ton/hr can be calculated as follows:

$$E \text{ (allowable emission, lb/hr)} = 4.1 * P \text{ (process wt. rate, ton/hr)} ^{0.67}$$

$$= 4.1 * 2.66 ^{0.67} = 7.90 \text{ lb/hr} > 2.47 \text{ lb/hr} \quad \text{will comply}$$

**Appendix A: Emission Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Batesville Casket Company  
Address City IN Zip: 1000 East Pearl Street, Batesville, Indiana 47006  
CP: T137-7280  
Plt ID: 137-00016  
Reviewer: Scott Pan/EVP  
Date: April 8, 2002**

State Potential Emissions (uncontrolled):																		
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
<b>Assembly Plant</b>																		
High Solid Primer	Surface Coating	12.18	27.00%	0.00%	27.00%	0.00%	55.20%	0.1476	90.00	3.3	3.29	43.69	1048.46	191.34	155.20	8.51	70.00%	
Omega Basecoat	Surface Coating	9.10	57.20%	0.00%	57.20%	0.00%	42.80%	0.1476	90.00	5.2	5.21	69.15	1659.50	302.86	67.98	17.37	70.00%	
Carnation	Surface Coating	10.65	38.20%	0.00%	38.20%	0.00%	39.80%	0.2334	90.00	4.1	4.07	85.46	2051.01	374.31	181.67	14.60	70.00%	
Plastic Topcoat	Surface Coating	7.40	90.00%	0.00%	90.00%	0.00%	9.00%	0.1745	90.00	6.7	6.66	104.60	2510.29	458.13	15.27	105.71	70.00%	
Hi Build Clear	Surface Coating	8.85	34.10%	0.00%	34.10%	0.00%	52.90%	0.1745	90.00	3.0	3.02	47.40	1137.49	207.59	120.35	8.15	70.00%	
Brush Clearcoat (B-14-40)	Surface Coating	8.54	45.59%	0.00%	45.59%	0.00%	42.30%	0.0441	50.00	3.9	3.89	8.58	206.04	37.60	13.46	13.15	70.00%	
Solvent (B-14-40)	Clean-up	7.01	100.00%	0.00%	100.00%	0.00%	0.00%	0.0002	50.00	7.0	7.01	0.07	1.77	0.32	0.00		100.00%	
<b>Stamping Plant</b>																		
Solvent	Clean-up	6.73	100.00%	0.00%	100.00%	0.00%	0.00%	0.0150	120.00	6.7	6.73	12.11	290.74	53.06	0.00		100.00%	
<b>Options Plant - 3 air atomization/electrostatic guns (coating usages are mutually exclusive)</b>																		
Crystal Tinted Sealer	Surface Coating	7.85	66.70%	0.00%	66.70%	0.00%	23.30%	0.1400	59.00	5.2	5.24	43.25	1037.97	189.43	28.37	32.10	70.00%	
Autumn Oak Spray	Surface Coating	6.98	95.10%	0.00%	95.10%	0.00%	49.00%	0.1400	59.00	6.6	6.64	54.83	1315.91	240.15	3.71	19.35	70.00%	
<b>Options Plant - Metal and Wood Urn Coating Lines</b>																		
Primer	Metal Urn Coating	9.6	49.22%	0.0%	49.2%	0.0%	31.64%	0.03000	36.000	4.70	4.70	5.08	121.84	22.24	5.74	14.86	75%	
Clear Topcoat	Metal Urn Coating	8.4	47.01%	0.0%	47.0%	0.0%	45.65%	0.14000	36.000	3.94	3.94	19.88	477.08	87.07	24.54	8.64	75%	
Basecoat (worst-case coating)	Metal Urn Coating	7.7	69.60%	0.0%	69.6%	0.0%	24.76%	0.06000	36.000	5.33	5.33	11.52	276.38	50.44	5.51	21.53	75%	
Sealer (worst-case coating)	Wood Urn Coating	7.9	76.42%	0.0%	76.4%	0.0%	16.32%	0.05000	32.000	6.00	6.00	9.60	230.36	42.04	3.24	36.76	75%	
Stain (worst-case coating)	Wood Urn Coating	7.0	95.05%	0.0%	95.1%	0.0%	2.49%	0.05000	32.000	6.63	6.63	10.62	254.76	46.49	0.61	266.45	75%	
Clearcoat (worst-case coating)	Wood Urn Coating	7.7	69.96%	0.0%	70.0%	0.0%	23.62%	0.20000	32.000	5.39	5.39	34.52	828.51	151.20	16.23	22.84	75%	
<b>Total Potential Emissions:</b>												<b>560.34</b>	<b>13448.10</b>	<b>2264.85</b>	<b>641.88</b>			
<b>Total Controlled Emissions:</b>										Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year **	Controlled PM tons/yr			
										VOC	PM							
										-----	99.00%	<b>560.34</b>	<b>13448.10</b>	<b>1649.23</b>	<b>6.42</b>			

\*\* Clean-up solvent usage at the Stamping Plant and VOC usage for 3 HVLP guns at the Options Plant are each limited at less than 25 tons/yr, to render 326 IAC 8-1-6 not applicable.

\*\* Toto VOC usages for metal and wood urn coating lines combined are limited at less than 40 tons per year to render PSD not applicable.

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids) \* Transfer Efficiency

Total = Sum of all coatings and solvents used

Controlled emission rate = uncontrolled emission rate \* (1 - control efficiency)

**Appendix A: Emission Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Batesville Casket Company  
Address City IN Zip: 1000 East Pearl Street, Batesville, Indiana 47006  
CP: T137-7280  
Plt ID: 137-00016  
Reviewer: Scott Pan/EVP  
Date: April 8, 2002**

State Potential Emissions (uncontrolled):																		
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
<b>Assembly Plant</b>																		
High Solid Primer	Surface Coating	12.18	27.00%	0.00%	27.00%	0.00%	55.20%	0.1476	90.00	3.3	3.29	43.69	1048.46	191.34	155.20	8.51	70.00%	
Omega Basecoat	Surface Coating	9.10	57.20%	0.00%	57.20%	0.00%	42.80%	0.1476	90.00	5.2	5.21	69.15	1659.50	302.86	67.98	17.37	70.00%	
Carnation	Surface Coating	10.65	38.20%	0.00%	38.20%	0.00%	39.80%	0.2334	90.00	4.1	4.07	85.46	2051.01	374.31	181.67	14.60	70.00%	
Plastic Topcoat	Surface Coating	7.40	90.00%	0.00%	90.00%	0.00%	9.00%	0.1745	90.00	6.7	6.66	104.60	2510.29	458.13	15.27	105.71	70.00%	
Hi Build Clear	Surface Coating	8.85	34.10%	0.00%	34.10%	0.00%	52.90%	0.1745	90.00	3.0	3.02	47.40	1137.49	207.59	120.35	8.15	70.00%	
Brush Clearcoat (B-14-40)	Surface Coating	8.54	45.59%	0.00%	45.59%	0.00%	42.30%	0.0441	50.00	3.9	3.89	8.58	206.04	37.60	13.46	13.15	70.00%	
Solvent (B-14-40)	Clean-up	7.01	100.00%	0.00%	100.00%	0.00%	0.00%	0.0002	50.00	7.0	7.01	0.07	1.77	0.32	0.00		100.00%	
<b>Stamping Plant</b>																		
Solvent	Clean-up	6.73	100.00%	0.00%	100.00%	0.00%	0.00%	0.0150	120.00	6.7	6.73	12.11	290.74	53.06	0.00		100.00%	
<b>Options Plant - Metal and Wood Urn Coating Lines</b>																		
Primer	Metal Urn Coating	9.6	49.22%	0.0%	49.2%	0.0%	31.64%	0.03000	36.000	4.70	4.70	5.08	121.84	22.24	5.74	14.86	75%	
Clear Topcoat	Metal Urn Coating	8.4	47.01%	0.0%	47.0%	0.0%	45.65%	0.14000	36.000	3.94	3.94	19.88	477.08	87.07	24.54	8.64	75%	
Basecoat (worst-case coating)	Metal Urn Coating	7.7	69.60%	0.0%	69.6%	0.0%	24.76%	0.06000	36.000	5.33	5.33	11.52	276.38	50.44	5.51	21.53	75%	
Sealer (worst-case coating)	Wood Urn Coating	7.9	76.42%	0.0%	76.4%	0.0%	16.32%	0.05000	32.000	6.00	6.00	9.60	230.36	42.04	3.24	36.76	75%	
Stain (worst-case coating)	Wood Urn Coating	7.0	95.05%	0.0%	95.1%	0.0%	2.49%	0.05000	32.000	6.63	6.63	10.62	254.76	46.49	0.61	266.45	75%	
Clearcoat (worst-case coating)	Wood Urn Coating	7.7	69.96%	0.0%	70.0%	0.0%	23.62%	0.20000	32.000	5.39	5.39	34.52	828.51	151.20	16.23	22.84	75%	
<b>Total Potential Emissions:</b>												<b>462.26</b>	<b>11094.21</b>	<b>2024.69</b>	<b>609.80</b>			
										Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year **	Controlled PM tons/yr			
										VOC      PM		462.26	11094.21	1599.23	6.10			
<b>Total Controlled Emissions:</b>										-----		99.00%	462.26	11094.21	1599.23	6.10		

\*\* Clean-up solvent usage at the Stamping Plant and VOC usage for 3 HVLP guns at the Options Plant are each limited at less than 25 tons/yr, to render 326 IAC 8-1-6 not applicable.

\*\* Toto VOC usages for metal and wood urn coating lines combined are limited at less than 40 tons per year to render PSD not applicable.

**Methodology:**

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids) \* Transfer Efficiency
- Total = Sum of all coatings and solvents used
- Controlled emission rate = uncontrolled emission rate \* (1 - control efficiency)

**Appendix A: Emission Calculations  
Natural Gas Combustion  
MM Btu/hr < 0.3**

**Company Name: Batesville Casket Company**  
**Address City IN Zip: 1000 East Pearl Street, Batesville, Indiana 47006**  
**CP: T137-7280**  
**Plt ID: 137-00016**  
**Reviewer: Scott Pan/EVP**  
**Date: Feb. 20, 2002**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

8.0

70.1

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.60	7.60	0.6	94.0	5.5	40.0
Potential Emission in tons/yr	0.27	0.27	0.02	3.29	0.19	1.40

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 emissions.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, Residential Furnaces (no SCC)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emission Calculations  
Natural Gas Combustion  
MM Btu/hr 0.3 - < 100**

**Company Name: Batesville Casket Company  
Address City IN Zip: 1000 East Pearl Street, Batesville, Indiana 47006  
CP: T137-7280  
Pit ID: 137-00016  
Reviewer: Scott Pan/EVP  
Date: Feb. 20, 2002**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

120.4

1054.6

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	4.01	4.01	0.32	52.73	2.90	44.29

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32

All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 er

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name: Batesville Casket Company  
Address City IN Zip: 1000 East Pearl Street, Batesville, Indiana 47006  
CP: T137-7280  
Plt ID: 137-00016  
Reviewer: Scott Pan/EVP  
Date: Feb. 20, 2002**

Material	Density (Lb/Gal)	Maximum Usage (Gal/yr)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Total (ton/yr)
<b>Source Wide Emissions Excluding Urn Coating Lines &amp; Brush Unit of Assembly Plant</b>											
High Solid Primer	12.18	121230	5.00%	0.00%	0.00%	5.00%	36.91	0.00	0.00	36.91	73.83
Omega Basecoat	9.10	121230	17.90%	16.48%	0.00%	0.00%	98.74	90.90	0.00	0.00	189.64
Carnation	10.65	188874	5.00%	20.00%	1.00%	0.00%	50.29	201.15	10.06	0.00	261.50
Plastic Topcoat	7.40	142438	1.50%	0.00%	0.00%	35.00%	7.91	0.00	0.00	184.46	192.36
Hi Build Clear	8.85	142438	20.00%	0.00%	5.00%	0.00%	126.06	0.00	31.51	0.00	157.57
Autumn Oak Spray	6.98	7231	50.00%	10.00%	15.00%	0.00%	12.62	2.52	3.79	0.00	18.93
<b>Metal Urn Coating Line</b>											
Primer	9.60	9461	2.50%	15.00%	0.00%	0.00%	1.14	6.81	0.00	0.00	18.93
Clear Topcoat	8.40	44150	21.00%	0.00%	4.00%	0.00%	38.94	0.00	7.42	0.00	18.93
Ivory Pearl	8.30	18922	40.00%	0.00%	8.00%	0.00%	31.41	0.00	6.28	0.00	18.93
<b>Wood Urn Coating Line</b>											
Sealer	7.90	14016	2.50%	37.50%	0.00%	0.00%	1.38	20.76	0.00	0.00	18.93
Autumn Oak Spray	7.00	14016	47.50%	7.50%	12.50%	0.00%	23.30	3.68	6.13	0.00	18.93
Clear Topcoat	7.70	56064	2.50%	0.00%	2.50%	0.00%	5.40	0.00	5.40	0.00	18.93
<b>Brush Unit of Assembly Plant</b>											
Brush Topcoat Mix	8.54	19316	12.02%	0.00%	2.00%	0.00%	9.91	0.00	1.65	0.00	18.93

**Total Potential Emissions** 444.00      325.83      72.23      221.37      1026.34

**Limited Emissions** 362.43      314.58      67.01      241.37      962.76

(single HAP and total HAPs for each of the two urn coating lines are limited at less than 10 and 25 tons per year, respectively)

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 1 ton/2000 lbs